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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LAS VEGAS SUN, INC.,

Plaintiff,

v.

SHELDON ADELSON, et al.,

Defendants.

AND RELATED COUNTERCLAIM

Case No. 2:19-cv-01667-ART-MDC

ORDER GRANTING

**STIPULATION REGARDING SEALING
DEFENDANTS' OPPOSITION TO
PLAINTIFF/ COUNTERDEFENDANTS'
MOTION FOR PARTIAL
RECONSIDERATION OF ORDER
(ECF NO. 970) [ECF NO. 980]**

1 Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN
 2 GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through
 3 their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm,
 4 and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants
 5 NEWS+MEDIA CAPITAL GROUP LLC, THE ESTATE OF SHELDON ADELSON, PATRICK
 6 DUMONT, and INTERFACE OPERATIONS LLC dba ADFAM (collectively “Defendants”), by
 7 and through their counsel of record, Kemp Jones, LLP, Jenner & Block LLP, and Richard L. Stone,
 8 Esq., hereby stipulate and agree as follows:

9 1. On March 18, 2022, the Court ordered, *inter alia*, the parties to meet and confer
 10 prior to filing any additional motions to seal. ECF No. 619. The parties met-and-conferred on May
 11 22, 2024, regarding sealing relating to Defendants’ Opposition to Plaintiff/Counterdefendants’
 12 Motion for Partial Reconsideration of Order (ECF No. 970) [ECF No. 980] (the “Opposition”).
 13 Lucy Crow, on behalf of the Sun, and Kristen Green, on behalf of Defendants, engaged in a meet
 14 and confer.

15 2. The parties agree that the following, and any references thereto, are appropriate for
 16 sealing and meet the compelling reasons standard under *Kamakana v. City and County of*
 17 *Honolulu*, 447 F.3d 1172 (9th Cir. 2006). The parties agree that all 2019 arbitration materials have
 18 previously been ordered sealed by the Nevada State District Court and the Nevada Supreme Court.
 19 This Court has agreed that they shall remain sealed in these proceedings. Exhibits B–P listed below
 20 are materials from the 2019 arbitration or are materials from the state-court action that reference
 21 confidential information from the 2019 arbitration and should therefore be sealed.

- 22 • **Exhibit B:** Demand for Arbitration of Claimant Las Vegas Sun, Inc., dated February
 23 12, 2018, and filed in AAA.
- 24 • **Exhibit C:** Excerpts of Claimant Las Vegas Sun’s Statement in Support of Demand
 25 for Arbitration, dated February 12, 2018, filed in AAA and produced in this action
 26 [DEFS0201245-0201411]. Defendants have designated this document as
 27 “Confidential” pursuant to the parties’ Protective Order.
 28

- 1 • **Exhibit D:** Correspondence of Respondents News+Media Capital Group LLC and Las
2 Vegas Review Journal, Inc., to counsel for Claimant Las Vegas Sun, Inc. and to AAA,
3 contesting AAA jurisdiction to proceed with arbitration, dated March 22, 2018.
- 4 • **Exhibit E:** Excerpts of Robert Cauthorn's Deposition Transcript in AAA, dated March
5 27, 2019.
- 6 • **Exhibit F:** Excerpts of Robert Cauthorn's Testimony in AAA, dated April 26, 2019.
- 7 • **Exhibit G:** Excerpts of Claimant Las Vegas Sun, Inc.'s Pre-Hearing Brief in AAA,
8 dated April 8, 2019.
- 9 • **Exhibit H:** Excerpts of Claimant Las Vegas Sun, Inc.'s Opening Statements in AAA,
10 dated April 15, 2019.
- 11 • **Exhibit I:** Excerpts of Suzy Cain's testimony in AAA, dated April 16, 2019.
- 12 • **Exhibit J:** Excerpts of Claimant Las Vegas Sun, Inc.'s Closing Statements in AAA,
13 dated May 9, 2019.
- 14 • **Exhibit K:** Excerpts of the PowerPoint presentation of Claimant Las Vegas Sun, Inc.
15 in AAA, presented on May 9, 2019.
- 16 • **Exhibit L:** Excerpts of Claimant's Post-Hearing Brief filed by Claimant Las Vegas
17 Sun, Inc. in AAA, dated June 3, 2019.
- 18 • **Exhibit M:** Excerpts of Respondents' Post-Hearing Brief filed by Respondents
19 News+Media Capital Group LLC and Las Vegas Review Journal, Inc. in AAA, dated
20 June 3, 2019.
- 21 • **Exhibit N:** Excerpts of Plaintiff's Motion to Confirm Arbitration Award, in Part, and
22 to Vacate or, Alternatively, Modify or Correct the Award, in Part, filed under seal in
23 the District Court of Clark County, Nevada, dated September 13, 2019.
- 24 • **Exhibit O:** Excerpts of Plaintiff's Reply to Defendants' News+Media Capital Group
25 LLC and Las Vegas Review Journal, Inc.'s Opposition to Plaintiff's Motion to Confirm
26 Arbitration Award, in Part, and to Vacate or, Alternatively, Modify or Correct the
27 Award, in Part and Defendants' Conditional Countermotion to Confirm Arbitration
28

Award, in Part, and to Vacate the Award, in Part, filed under seal in the District Court of Clark County, Nevada, dated October 11, 2019.

- **Exhibit P:** Excerpts of Answering Brief on Appeal and Opening Brief on Cross-Appeal, filed under seal by Respondent/Cross-Appellant Las Vegas Sun, Inc., in the Supreme Court of Nevada on July 22, 2020.
- References in the Opposition to the exhibits referenced above.
- References in the Opposition to the Final Award of Arbitrator in AAA, dated July 2, 2019, which was previously filed under seal at ECF No. 510-2 (Ex. B).
- References in the Opposition to excerpts of Barbara Gottlieb’s Expert Report, dated September 19, 2022, which were previously filed under seal at ECF No. 846-19 (Ex. S). Ms. Gottlieb’s expert report has been designated “Highly Confidential” by the Sun pursuant to the parties’ Protective Order. The report contains sensitive business and financial information and should not be made public.

DATED this 23rd day of May, 2024.

DATED this 23rd day of May, 2024.

LEWIS ROCA ROTHGERBER CHRISTIE
LLP

KEMP JONES, LLP

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By: /s/ Michael J. Gayan

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Attorneys for Defendants/ Counterclaimant

IT IS SO ORDERED:



Anne R. Traum
United States District Court

DATED: May 30, 2024